

# DEPARTMENT OF ENVIRONMENT AND CONSERVATION TENNESSEE DIVISION OF AIR POLLUTION CONTROL ANNUAL INSPECTION

Facility No.: 59-0061 State Category: Title V	I	Lead Inspect	or: JWK	
Date Inspected: November	9, 2014 O	n-Site:	X_YES	NO
Location address: 201 Ga	ic Kansei North America, Inc. arrett Parkway ourg, TN 37091 t: n/a			
Responsible Official/Title: Phone: E-Mail Address:	Roger Murphree / Director of Plastics 931-270-2852 roger_murphree@ck-mail.com			
Facility Contact/Title: Phone: E-Mail Address:	Theresa Ervin / Environmental Engine 931-680-6522 theresa_ervin@ck-mail.com	eer		
	ection: July 30, 2013 s inspection, from: July 30, 2013 to prehensive? Comprehensive	: November	19, 2014	
Total time required for this	inspection (hours): 24.5			
	e during entire inspection time periond explain violation(s) after table.	d? <u>X</u> Y	'ES	_NO
Violation(s) Description	NOV Date	Issued By CV, Perm		EAR#
n/a	n/a	n/a		n/a

### **Description of Facility Operations:**

If OUT, provide explanation.

Current Compliance Status: X IN

Comments: n/a

Comments: n/a

This facility consists of: surface coating of plastic automotive components (pt. 01), surface coating of plastic automotive instrument panels with thermal oxidizer control (pt. 03), and a wave soldering operation (pt. 23).

OUT

Review Status of Required Reports: Include all reports due/reviewed since last AI report

Report Type (SAR, ACC, MACT, CM)	Timeframe Report Covers	Due Date	Received in CO	Received in EFO	Postmarked Date	Reviewed Date	Report Adequate (Y/N) if N, explain below	SL Report Tracking Number
MACT SAR	10-01-2012 through 03-31-2013	05-31-2013	05-22-2013	n/a	n/a	02-13-2014	unknown	14451
MACT SAR	04-01-2013 through 09-30-2013	11-29-2013	11-12-2013	n/a	n/a	02-13-2014	unknown	16209
SAR	04-01-2013 through 09-30-2013	11-29-2013	n/a	11-07-2013	n/a	11-07-2013	Yes	15324
ACC	10-01-2012 through 09-30-2013	11-29-2013	11-12-2013	11-19-2013	n/a	11-19-2013	Yes	14128
SAR	10-01-2013 through 03-31-2014	05-30-2014	n/a	05-08-2014	n/a	05-08-2014	Yes	17023
MACT SAR	10-01-2013 through 03-31-2014	05-30-2014	05-08-2014	n/a	n/a	05-16-2014	Yes	17027
ACC	10-01-2013 through 09-30-2014	11-29-2014	n/a	11-24-2014	11-24-2014	11-25-2014	Yes	16210
SAR	04-01-2014 through 09-30-2014	11-29-2014	n/a	11-24-2014	11-24-2014	11-25-2014	Yes	18271
MACT SAR	04-01-2014 through 09-30-2014	11-29-2014	11-25-2014	n/a	unknown	unknown	unknown	18032

Comments: n/a

Vi	sible	<b>Emissions</b>	Status/Ev:	aluations:

All emission points observed and no visible emissions seen: X YES NO

Source Number & Stack ID	Date of VEE	Limit/Method	Compliance Status (IN/OUT)
n/a	n/a	n/a	n/a

Comments about visible emissions observed if no VEE conducted: n/a

#### 1) Permit Status:

For each permit used for this inspection, repeat items 1-5 to include details for each permit.

Permit Number	Source Number(s)	Issue/Amendment/Modification Date	Expiration Date	Next Application Due Date	Next Application Received Date
563336	01, 03, 23	Issued: 03-05-2013 Amendment: 05-02-2014	03-04-2018	06-07-2017 through 09-05-2017	n/a

Comments: Administrative Amendment #1 was issued merely to change the responsible official.

#### 2) Mass Emission Limits:

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
01	E5-1	PM: 0.02 gr./dscf. (26.06 lbs./hr. and 114.14 tons/yr.)	0.4 tons/yr. (12 months ending Apr. – May. 2014)
01	E5-2	VOC: 200 tons/12 cons. months	32.4 tons (12 months ending Aug. 2013)
03	E6-1	PM: 2.2 tons/12 cons. months	0.0 tons/12 cons. months
03	E6-2	VOC: 5.0 tons/12 cons. months	0.0 tons/12 cons. months
23	E7-1	VOC: 16.26 tons/12 cons. months	1.74 tons (12 months ending FebMar. 2014)
23	E7-2	Pb: 12.75 lbs./month (0.0765 ton/12 cons. months)	3.0 lbs. (Sep. 2013) 0.01 tons/12 cons. months

#### Comments: n/a

# 3) Process Parameters (feed rates, input limits, work practice standards, etc.):

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
01	E5-1	No surface coating shall occur in any spray booth without using the filter control devices.	n/a - Filter control devices in operation.
03	E6-2	No operation without use of thermal oxidizer control equipment	Source not in operation during review period.
23	E7-2	Solder usage < 8.5 tons/month	2.0 tons (Sep. 2013)

#### Comments: n/a

# 4) Control Equipment Operating Parameters (flow rates, pressure drop, temperature, etc.):

Source Number	Permit Condition	Condition Limit	Value During On-Site Inspection	Compliance Maintained (Yes/No)
03	E6-2	Minimum combustion chamber temperature of 1400°F averaged over a three-hour period	Not in operation	n/a
03	E6-2	Average facial air velocity shall be at least 200 ft./min. into the enclosure. Other access doors and windows shall be closed during routine process	Not in operation	n/a

Annual Inspection

operation.

Comments: n/a

# 5) On-Site Review of Facility Records and Operating Logs:

Source Number	Permit Condition	Type of Record/Log	Review Time Frame	Compliance (Yes/No)
Facility wide	E3-1	Purchase orders/invoices for all VOC and HAP containing materials as well as MSDS	Jul. 2013 – Oct. 2014	Yes
Facility wide	E3-3	VOC and HAP emissions	Jul. 2013 – Oct. 2014	Yes
Facility wide	E3-6	Monthly maintenance records for each air pollution control device	Jul. 2013 – Oct. 2014	Yes
01	E5-1	Monthly log of total paint usage Filter removal logs PM emissions records	Jul. 2013 – Oct. 2014	Yes
03	E6-1	Monthly log of total paint usage Filter removal logs PM emissions records	Jul. 2013 – Oct. 2014	Not in operation during review period
03	E6-2	Thermal oxidizer temperature records NDO air velocity records	Jul. 2013 – Oct. 2014	Not in operation during review period
23	E7-3	Solder usage records Lead emissions records	Jul. 2013 – Oct. 2014	Yes

Comments: n/a

# **Additional Information:**

A copy of the Department's <i>Mercury-Added Product Disposal Requirements</i> was given to the facility for review:XYESNO
Was any complaint received?YESXNO  If YES, provide comments: n/a
Has open burning occurred at this facility?YESXNO  If YES, provide comments: n/a
Was any stack testing required?YESXNO  If YES, provide comments: n/a
Was any stack testing performed?YESXNO If YES, provide comments: n/a
Was there any air-related construction/modification?YESXNO  If YES, provide comments: n/a
Is any air-related construction/modification planned?YESXNO  If YES, provide comments: n/a

Are there any unpermitted and/or exempt sources (e.g., generators, stationary engines, boilers) that need further attention?

If YES, provide comments: n/a YES X NO

Lead Inspector's Name

VEE Certification Number: 2403

Certification Expiration Date: March 2015

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

Supervisor/Manager

December 10, 2014